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9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 RAMON DESAGE, aka RAMON ABI-
RACHED, aka RAYMOND ANTOINE
ABI-RACHED,
15 Defendant.

2:13-CR-039-JAD-VCF

**Order Granting Unopposed Motion to
Extend Time for Replies in Support of
Richardson and Vechery's Motions to
Intervene**

ECF No. 426

16
17 This Motion to Extend Time is the second request. LR IA 6-1.

18 William Richardson (Richardson) and Harvey Vechery (Vechery) requested the first
19 extension to, and including, April 20, 2020, ECF No. 394. This Court granted the
20 extension, ECF No. 398. Richardson and Vechery respectfully move this Court for a Second
21 Order extending the time for Richardson and Vechery to file their respective Replies to the
22 government's Responses, ECF Nos. 372, 373, to Richardson's and Vechery's Motions to
23 Intervene, ECF Nos. 349, 361, to and including June 30, 2020. The parties hope the
24 settlement can be completed before that date. The reason is the government, Richardson,
25 and Vechery have made progress in settling the civil forfeiture in rem action and the
26 criminal litigation. The next step in the settlement process is that based on Richardson's
27 signed Stipulation and Petition for Remission and Mitigation under the exclusive executive
28 branch procedure for potential settlement only, Vechery's signed Stipulation and Petition for

1 Remission and Mitigation under the exclusive executive branch procedure for potential
2 settlement only, the government will prepare documents and memorandums that have five
3 levels of review that ends with the Chief of Money Laundering Asset Recovery Section,
4 Criminal Division, United States Department of Justice, for preapproval of the exclusive
5 executive branch Petitions for Remission and Mitigation in the civil forfeiture case.¹

6 For the first extension of time, the government consented to the extension of time at
7 the request of David Chesnoff, counsel for Richardson, on December 18, 2019, and
8 consented to the extension of time at the request of Patricia Lee, counsel for Vechery, on
9 December 23, 2019.

10 The government consented to this second extension of time as requested by Patricia
11 Lee for Vechery and David Chesnoff for Richardson on April 14, 2020.

12 This Motion is not submitted solely for the purpose of delay or for any other
13 improper purpose.

14 This Court should grant an extension of time to, and including, June 30, 2020.

15 Dated: April 14, 2020.

16 NICHOLAS A. TRUTANICH
17 United States Attorney
18 /s/ Daniel D. Hollingsworth
19 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

20 **ORDER**

21 Good cause appearing, IT IS HEREBY ORDERED that the Motion to Extend Time
[ECF No. 426] is GRANTED; the reply deadline is extended to June 30, 2020.

22 _____
23 U.S. District Judge Jennifer A. Dorsey
24 Dated: April 15, 2020

25 ¹ 21 U.S.C. § 853(i)(1); 18 U.S.C. §§ 981(e)(6) and 1963(g)(1); *MacInnes*, 223 F. App'x at 553
26 n.3 (explaining that the statutes and the CFR authorize the attorney general to determine
27 whether to provide relief to victims); *United States v. Carter*, 742 F.3d 440, 446 (9th Cir. 2014)
28 (explaining that “the Government may choose to assign forfeited proceeds to victims”);
DSI, 496 F.3d at 181-82; 28 CFR Part 9; see *Government's Response*, ECF No. 373, to *Harvey
Vechery's Motion to Intervene*, ECF No. 361.